

**EXHIBIT 8**

**REDACTED VERSION OF  
DOCUMENT SOUGHT TO BE  
SEALED**

---

**From:** Andrea P Roberts <andreaproberts@quinnemanuel.com>  
**Sent:** Wednesday, August 09, 2017 9:39 PM  
**To:** Maxwell Pritt  
**Cc:** Andrea P Roberts  
**Subject:** RE: Activity in Case 3:17-cv-00939-WHA Waymo LLC v. Uber Technologies, Inc. et al Order on Discovery Letter Brief

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Max,

We will run the searches on the custodians that Judge Corley ordered us to search. Judge Corley specifically ordered us to run the terms on the 11 identified custodians' emails and that is what we will do. We do not think it is appropriate for Uber to demand more than what the Court ordered or to change the custodians the Court ordered. Specifically, swapping [REDACTED] for [REDACTED] is not workable because Uber did not request that we search Ms. [REDACTED] emails until very late in the negotiations. Accordingly, her emails are not all collected and were not readily available for testing. Given where we are in the schedule, were we to complete collection of Ms. [REDACTED] emails it would still take a few days before they would even be ready for searching and then review and production. As for [REDACTED], again Judge Corley did not order that he be included as a custodian. That he was designated as a 30(b)(6) on Uber's bonus-related 30(b)(6) topic does not justify adding him as a custodian. Uber could have served its 30(b)(6) notice much earlier and did not.

Thanks,  
Andrea

---

**From:** Maxwell Pritt [mailto:mpritt@BSFLLP.com]  
**Sent:** Tuesday, August 08, 2017 7:22 AM  
**To:** Andrea P Roberts <andreaproberts@quinnemanuel.com>  
**Subject:** FW: Activity in Case 3:17-cv-00939-WHA Waymo LLC v. Uber Technologies, Inc. et al Order on Discovery Letter Brief

Hi Andrea,

Regarding the custodians for the bonus-related searches, please confirm you will replace [REDACTED] with [REDACTED] which was our last proposal as of the motion to compel. Also, we had proposed running the bonus-related searches against 13 custodians, not 11, by adding [REDACTED] and [REDACTED] (Mot. at 4 n.6.) It looks like Judge Corley missed that footnote. In any event we're willing to drop Mr. [REDACTED] if you would add Mr. [REDACTED] in light of his designation on the bonus 30(b)(6) topic. If you're not willing to do so, please let me know and we can add it to a meet and confer discussion. Thank you!

Best,  
Max

**From:** [ECF-CAND@cand.uscourts.gov](mailto:ECF-CAND@cand.uscourts.gov) [mailto:[ECF-CAND@cand.uscourts.gov](mailto:ECF-CAND@cand.uscourts.gov)]  
**Sent:** Monday, August 07, 2017 10:06 AM  
**To:** [efiling@cand.uscourts.gov](mailto:efiling@cand.uscourts.gov)

**Subject:** Activity in Case 3:17-cv-00939-WHA Waymo LLC v. Uber Technologies, Inc. et al Order on Discovery Letter Brief

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

California Northern District

### Notice of Electronic Filing

The following transaction was entered on 8/7/2017 at 10:06 AM and filed on 8/7/2017

**Case Name:** Waymo LLC v. Uber Technologies, Inc. et al

**Case Number:** [3:17-cv-00939-WHA](#)

**Filer:**

**Document Number:** [1094](#)

**Docket Text:**

**ORDER RE: UBER'S MOTION TO COMPEL WAYMO TO UTILIZE CERTAIN SEARCH TERMS. Signed by Magistrate Judge Jacqueline Scott Corley on 8/7/2017.(ahm, COURT STAFF) (Filed on 8/7/2017)**

3:17-cv-00939-WHA Notice has been electronically mailed to:

Aaron James Bergstrom [abergstrom@uber.com](mailto:abergstrom@uber.com)

Amy E Craig [amy@ramsey-ehrllich.com](mailto:amy@ramsey-ehrllich.com)

Andrea Pallios Roberts [andreaproberts@quinnemanuel.com](mailto:andreaproberts@quinnemanuel.com), [calendar@quinnemanuel.com](mailto:calendar@quinnemanuel.com),  
[patriciareilly@quinnemanuel.com](mailto:patriciareilly@quinnemanuel.com), [reneunger@quinnemanuel.com](mailto:reneunger@quinnemanuel.com)

Andrew Michael Holmes [drewholmes@quinnemanuel.com](mailto:drewholmes@quinnemanuel.com), [mercedeshereford@quinnemanuel.com](mailto:mercedeshereford@quinnemanuel.com)

Angela Lucia Padilla [angela.padilla@uber.com](mailto:angela.padilla@uber.com)

Arturo J. Gonzalez [agonzalez@mofo.com](mailto:agonzalez@mofo.com), [arturo-j-gonzalez-0254@ecf.pacerpro.com](mailto:arturo-j-gonzalez-0254@ecf.pacerpro.com), [edith-perez-7760@ecf.pacerpro.com](mailto:edith-perez-7760@ecf.pacerpro.com), [eperez@mofo.com](mailto:eperez@mofo.com)

Brett Michael Schuman [bschuman@goodwinlaw.com](mailto:bschuman@goodwinlaw.com), [MaryWong@goodwinprocter.com](mailto:MaryWong@goodwinprocter.com)

Carolyn Hoecker Luedtke [carolyn.luedtke@mto.com](mailto:carolyn.luedtke@mto.com), [erika.eberline@mto.com](mailto:erika.eberline@mto.com)

Charles Kramer Verhoeven [charlesverhoeven@quinnemanuel.com](mailto:charlesverhoeven@quinnemanuel.com), [rhodapiland@quinnemanuel.com](mailto:rhodapiland@quinnemanuel.com)

Daniel Pierre Muino [dmuino@mofo.com](mailto:dmuino@mofo.com), [mekas@mofo.com](mailto:mekas@mofo.com)

David Eiseman , IV [davideiseman@quinnemanuel.com](mailto:davideiseman@quinnemanuel.com), [lorenaalfaro@quinnemanuel.com](mailto:lorenaalfaro@quinnemanuel.com)

David Andrew Perlson [davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com), [calendar@quinnemanuel.com](mailto:calendar@quinnemanuel.com), [dawnsiadata@quinnemanuel.com](mailto:dawnsiadata@quinnemanuel.com), [ecf-0e2deb8cd9f2@ecf.pacerpro.com](mailto:ecf-0e2deb8cd9f2@ecf.pacerpro.com), [ge-waymo@quinnemanuel.com](mailto:ge-waymo@quinnemanuel.com)

David Michael Cooper [davidcooper@quinnemanuel.com](mailto:davidcooper@quinnemanuel.com)

David Shane Brun [sbrun@goodwinlaw.com](mailto:sbrun@goodwinlaw.com), [BGee@goodwinprocter.com](mailto:BGee@goodwinprocter.com), [khogard@goodwinprocter.com](mailto:khogard@goodwinprocter.com), [RFitzpatrick@goodwinprocter.com](mailto:RFitzpatrick@goodwinprocter.com), [StephenMiller@goodwinlaw.com](mailto:StephenMiller@goodwinlaw.com)

Edward Takashima [etakashima@bsflp.com](mailto:etakashima@bsflp.com), [stoy@bsflp.com](mailto:stoy@bsflp.com)

Eric Akira Tate [etate@mofo.com](mailto:etate@mofo.com), [ecrandall@mofo.com](mailto:ecrandall@mofo.com), [elizabeth-crandall-whittom-2923@ecf.pacerpro.com](mailto:elizabeth-crandall-whittom-2923@ecf.pacerpro.com), [eric-tate-2646@ecf.pacerpro.com](mailto:eric-tate-2646@ecf.pacerpro.com)

Esther Kim Chang [EChang@mofo.com](mailto:EChang@mofo.com), [esther-kim-9030@ecf.pacerpro.com](mailto:esther-kim-9030@ecf.pacerpro.com), [pat-wolfe-1783@ecf.pacerpro.com](mailto:pat-wolfe-1783@ecf.pacerpro.com), [pwolfe@mofo.com](mailto:pwolfe@mofo.com)

Felipe Corredor [felipecorredor@quinnemanuel.com](mailto:felipecorredor@quinnemanuel.com)

Grant Nicholas Margeson [grantmargeson@quinnemanuel.com](mailto:grantmargeson@quinnemanuel.com), [ginaherrera@quinnemanuel.com](mailto:ginaherrera@quinnemanuel.com)

Hamish Hume [hhume@bsflp.com](mailto:hhume@bsflp.com), [jholdip@bsflp.com](mailto:jholdip@bsflp.com), [LBridgett@BSFLLP.com](mailto:LBridgett@BSFLLP.com), [lchauncey@bsflp.com](mailto:lchauncey@bsflp.com), [slee@bsflp.com](mailto:slee@bsflp.com)

Hayes Phillips Hyde [hhyde@goodwinlaw.com](mailto:hhyde@goodwinlaw.com)

Hong-An Vu [hvu@goodwinlaw.com](mailto:hvu@goodwinlaw.com), [SCRobinson@goodwinprocter.com](mailto:SCRobinson@goodwinprocter.com)

Indra Neel Chatterjee [NChatterjee@goodwinlaw.com](mailto:NChatterjee@goodwinlaw.com), [CLogan@goodwinlaw.com](mailto:CLogan@goodwinlaw.com), [HHyde@goodwinlaw.com](mailto:HHyde@goodwinlaw.com), [JMcKenzie@goodwinlaw.com](mailto:JMcKenzie@goodwinlaw.com)

Ismail Jomo Ramsey [izzy@ramsey-ehrllich.com](mailto:izzy@ramsey-ehrllich.com), [amy@ramsey-ehrllich.com](mailto:amy@ramsey-ehrllich.com), [else@ramsey-ehrllich.com](mailto:else@ramsey-ehrllich.com), [katharine@ramsey-ehrllich.com](mailto:katharine@ramsey-ehrllich.com), [tonya@ramsey-ehrllich.com](mailto:tonya@ramsey-ehrllich.com)

James Lin [JLin@goodwinlaw.com](mailto:JLin@goodwinlaw.com)

James Dubois Judah [jamesjudah@quinnemanuel.com](mailto:jamesjudah@quinnemanuel.com), [calendar@quinnemanuel.com](mailto:calendar@quinnemanuel.com), [dawnsiadata@quinnemanuel.com](mailto:dawnsiadata@quinnemanuel.com)

James E. Baker [jamesbaker@quinnemanuel.com](mailto:jamesbaker@quinnemanuel.com)

Jared Weston Newton [jarednewton@quinnemanuel.com](mailto:jarednewton@quinnemanuel.com)

Jeffrey William Nardinelli [jeffnardinelli@quinnemanuel.com](mailto:jeffnardinelli@quinnemanuel.com), [amberburns@quinnemanuel.com](mailto:amberburns@quinnemanuel.com), [calendar@quinnemanuel.com](mailto:calendar@quinnemanuel.com)

Jessica E Phillips [jphillips@bsfllp.com](mailto:jphillips@bsfllp.com)

John L. Cooper [jcooper@fbm.com](mailto:jcooper@fbm.com), [brestivo@fbm.com](mailto:brestivo@fbm.com), [calendar@fbm.com](mailto:calendar@fbm.com), [mcate@fbm.com](mailto:mcate@fbm.com)

John M. Neukom [johnneukom@quinnemanuel.com](mailto:johnneukom@quinnemanuel.com), [christinamunoz@quinnemanuel.com](mailto:christinamunoz@quinnemanuel.com), [ecf-ffe64b85f282@ecf.pacerpro.com](mailto:ecf-ffe64b85f282@ecf.pacerpro.com), [jessicaperlman@quinnemanuel.com](mailto:jessicaperlman@quinnemanuel.com), [rosepantley@quinnemanuel.com](mailto:rosepantley@quinnemanuel.com)

John William McCauley , IV [johnmccauley@quinnemanuel.com](mailto:johnmccauley@quinnemanuel.com), [john-mccauley-1034@ecf.pacerpro.com](mailto:john-mccauley-1034@ecf.pacerpro.com)

Jonathan Alan Patchen [jpatchen@taylorpatchen.com](mailto:jpatchen@taylorpatchen.com), [cdunbar@taylorpatchen.com](mailto:cdunbar@taylorpatchen.com), [jcummins@taylorpatchen.com](mailto:jcummins@taylorpatchen.com), [schow@taylorpatchen.com](mailto:schow@taylorpatchen.com)

Jordan Ross Jaffe [jordanjaffe@quinnemanuel.com](mailto:jordanjaffe@quinnemanuel.com), [ecf-0b041b054580@ecf.pacerpro.com](mailto:ecf-0b041b054580@ecf.pacerpro.com), [ecf-49d7324e74e5@ecf.pacerpro.com](mailto:ecf-49d7324e74e5@ecf.pacerpro.com), [jessicasingh@quinnemanuel.com](mailto:jessicasingh@quinnemanuel.com), [joseph-leroy-quinn-emanuel-urquhart-sullivan-llp-4737@ecf.pacerpro.com](mailto:joseph-leroy-quinn-emanuel-urquhart-sullivan-llp-4737@ecf.pacerpro.com), [josephlerov@quinnemanuel.com](mailto:josephlerov@quinnemanuel.com), [kathleencorey@quinnemanuel.com](mailto:kathleencorey@quinnemanuel.com), [monitajones@quinnemanuel.com](mailto:monitajones@quinnemanuel.com)

Joshua Lee Sohn [joshuasohn@quinnemanuel.com](mailto:joshuasohn@quinnemanuel.com), [rosannawoods@quinnemanuel.com](mailto:rosannawoods@quinnemanuel.com), [westonreid@quinnemanuel.com](mailto:westonreid@quinnemanuel.com)

Joshua Nathaniel Friedman [jfriedman@bsfllp.com](mailto:jfriedman@bsfllp.com)

Karen Leah Dunn [kdunn@bsfllp.com](mailto:kdunn@bsfllp.com)

Kathleen R Hartnett [khartnett@bsfllp.com](mailto:khartnett@bsfllp.com)

Kevin Alexander Smith [kevinsmith@quinnemanuel.com](mailto:kevinsmith@quinnemanuel.com), [calendar@quinnemanuel.com](mailto:calendar@quinnemanuel.com)

Kevin K Chang [kevin.chang@kirkland.com](mailto:kevin.chang@kirkland.com), [jason.douangsanith@kirkland.com](mailto:jason.douangsanith@kirkland.com), [jguerrero@kirkland.com](mailto:jguerrero@kirkland.com), [sfarley@kirkland.com](mailto:sfarley@kirkland.com)

Kyle N. Smith [ksmith@bsfllp.com](mailto:ksmith@bsfllp.com)

Laurentia McKessar [laurentiamckessar@quinnemanuel.com](mailto:laurentiamckessar@quinnemanuel.com)

Leo Patrick Cunningham [lcunningham@wsgr.com](mailto:lcunningham@wsgr.com), [lkoontz@wsgr.com](mailto:lkoontz@wsgr.com)

Lindsay Cooper [lindsaycooper@quinnemanuel.com](mailto:lindsaycooper@quinnemanuel.com), [lindsay-cooper-quinn-emanuel-urquhart-sullivan-llp-9732@ecf.pacerpro.com](mailto:lindsay-cooper-quinn-emanuel-urquhart-sullivan-llp-9732@ecf.pacerpro.com)

Lindsey Keenan [lindseykeen@quinnemanuel.com](mailto:lindseykeen@quinnemanuel.com)

Martha Lea Goodman [mgoodman@bsfllp.com](mailto:mgoodman@bsfllp.com)

Matthew Ian Kreeger [mkreeger@mofo.com](mailto:mkreeger@mofo.com), [jgradv@mofo.com](mailto:jgradv@mofo.com), [matt-kreeger-6582@ecf.pacerpro.com](mailto:matt-kreeger-6582@ecf.pacerpro.com), [pat-wolfe-1783@ecf.pacerpro.com](mailto:pat-wolfe-1783@ecf.pacerpro.com)

Maxwell Vaughn Pritt [mpritt@bsfllp.com](mailto:mpritt@bsfllp.com), [ajensen@bsfllp.com](mailto:ajensen@bsfllp.com), [irivera@bsfllp.com](mailto:irivera@bsfllp.com), [jchavez@bsfllp.com](mailto:jchavez@bsfllp.com), [trobv@bsfllp.com](mailto:trobv@bsfllp.com)

Melanie Marilyn Blunski [melanie.blunski@lw.com](mailto:melanie.blunski@lw.com), [#sflitigationsservices@lw.com](mailto:#sflitigationsservices@lw.com), [melanie-blunski-5434@ecf.pacerpro.com](mailto:melanie-blunski-5434@ecf.pacerpro.com), [sf-litigation-services-4917@ecf.pacerpro.com](mailto:sf-litigation-services-4917@ecf.pacerpro.com)

Melissa B Felder [mfelder@bsflp.com](mailto:mfelder@bsflp.com)

Melissa Brook Felder Zappala [mzappala@bsflp.com](mailto:mzappala@bsflp.com)

Melissa J Baily [melissabaily@quinnemanuel.com](mailto:melissabaily@quinnemanuel.com), [ecf-8fc26ad9f01a@ecf.pacerpro.com](mailto:ecf-8fc26ad9f01a@ecf.pacerpro.com), [gina--herrera--4586@ecf.pacerpro.com](mailto:gina--herrera--4586@ecf.pacerpro.com), [ginaherrera@quinnemanuel.com](mailto:ginaherrera@quinnemanuel.com)

Meredith Richardson Dearborn [mdearborn@bsflp.com](mailto:mdearborn@bsflp.com), [cseki@bsflp.com](mailto:cseki@bsflp.com), [jchavez@bsflp.com](mailto:jchavez@bsflp.com), [jday@bsflp.com](mailto:jday@bsflp.com), [mkim@bsflp.com](mailto:mkim@bsflp.com), [sphan@bsflp.com](mailto:sphan@bsflp.com)

Michael A. Brille [mbrille@bsflp.com](mailto:mbrille@bsflp.com)

Michael A. Jacobs [mjacobs@mofo.com](mailto:mjacobs@mofo.com), [cknisely@mofo.com](mailto:cknisely@mofo.com), [cyndi-knisely-3532@ecf.pacerpro.com](mailto:cyndi-knisely-3532@ecf.pacerpro.com), [ecf-notifications@uber.com](mailto:ecf-notifications@uber.com), [michael-jacobs-3136@ecf.pacerpro.com](mailto:michael-jacobs-3136@ecf.pacerpro.com)

Michael Darron Jay [mjav@bsflp.com](mailto:mjav@bsflp.com), [dmcknight@bsflp.com](mailto:dmcknight@bsflp.com), [ecolle@bsflp.com](mailto:ecolle@bsflp.com), [jday@bsflp.com](mailto:jday@bsflp.com), [jparaon@bsflp.com](mailto:jparaon@bsflp.com), [mdearborn@bsflp.com](mailto:mdearborn@bsflp.com), [sphan@bsflp.com](mailto:sphan@bsflp.com)

Michelle Ching Youn Yang [myang@mofo.com](mailto:myang@mofo.com)

Miles F. Ehrlich [miles@ramsey-ehrllich.com](mailto:miles@ramsey-ehrllich.com), [amy@ramsey-ehrllich.com](mailto:amy@ramsey-ehrllich.com), [elese@ramsey-ehrllich.com](mailto:elese@ramsey-ehrllich.com), [katharine@ramsey-ehrllich.com](mailto:katharine@ramsey-ehrllich.com), [tonya@ramsey-ehrllich.com](mailto:tonya@ramsey-ehrllich.com)

Nicole Townsend Bartow [nbartow@uber.com](mailto:nbartow@uber.com)

Patrick Thomas Schmidt [patrickschmidt@quinnemanuel.com](mailto:patrickschmidt@quinnemanuel.com)

Phong T. Dinh [PDinh@goodwinlaw.com](mailto:PDinh@goodwinlaw.com)

Rachel Elizabeth Epstein [rachelepstein@quinnemanuel.com](mailto:rachelepstein@quinnemanuel.com)

Rachel Melissa Walsh [RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com), [docketing@goodwinlaw.com](mailto:docketing@goodwinlaw.com), [MaryWong@goodwinprocter.com](mailto:MaryWong@goodwinprocter.com), [mleahy@goodwinlaw.com](mailto:mleahy@goodwinlaw.com)

Robert Burkart Ellis [robert.ellis@kirkland.com](mailto:robert.ellis@kirkland.com), [nora.shea@kirkland.com](mailto:nora.shea@kirkland.com)

Rudolph Kim [rudykim@mofo.com](mailto:rudykim@mofo.com), [dgillis@mofo.com](mailto:dgillis@mofo.com), [donna-gillis-3037@ecf.pacerpro.com](mailto:donna-gillis-3037@ecf.pacerpro.com), [fsagapolu@mofo.com](mailto:fsagapolu@mofo.com), [rudy-kim-5211@ecf.pacerpro.com](mailto:rudy-kim-5211@ecf.pacerpro.com)

Scott Frederick Llewellyn [slllewellyn@mofo.com](mailto:slllewellyn@mofo.com), [scott-llewellyn-9009@ecf.pacerpro.com](mailto:scott-llewellyn-9009@ecf.pacerpro.com)

Sylvia Rivera [srivera@mofo.com](mailto:srivera@mofo.com), [mmendoza@mofo.com](mailto:mmendoza@mofo.com)

Wendy Joy Ray [wray@mofo.com](mailto:wray@mofo.com), [etovar@mofo.com](mailto:etovar@mofo.com)

Whitney Weber [whitney.weber@lw.com](mailto:whitney.weber@lw.com), [#sflitigationsservices@lw.com](mailto:#sflitigationsservices@lw.com), [john.eastly@lw.com](mailto:john.eastly@lw.com), [whitney-weber-2642@ecf.pacerpro.com](mailto:whitney-weber-2642@ecf.pacerpro.com)

**3:17-cv-00939-WHA Please see [Local Rule 5-5](#); Notice has NOT been electronically mailed to:**

**The following document(s) are associated with this transaction:**

**Document description:**Main Document

**Original filename:**C:\fakepath\17-cv-00939-wha-order\_re\_compel\_search\_terms.636377214117586430.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=8/7/2017] [FileNumber=13975263-0]

[aa032fa554fcc7a52ef86ca7bc09a34842f70f55ea57bcac7991bbd2b5c4a84721d5a

a139fede073d1553662d5bc2469273ffe4559f7f373ac06cd79285669c5]]

---

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1]